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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

PURDUE PHARMA L.P., et al.,

Debtors.1

Chapter 11

Case No. 19-23649 (RDD)

Jointly Administered

STATEMENT OF THE MORTIMER SACKLER INITIAL COVERED SACKLER PERSONS IN RESPECT OF THE REPLY IN SUPPORT OF MOTIONS TO UNSEAL JUDICIAL RECORDS BY DOW JONES & COMPANY, INC., BOSTON GLOBE MEDIA PARTNERS, LLC, AND REUTERS NEWS & MEDIA, INC.

The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield Bio Ventures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

1. The Mortimer Sackler Initial Covered Sackler Persons ("Side A ICSPs"), by and through their undersigned counsel, hereby submits this brief statement in respect of the *Reply in Support of Motions Unseal Judicial Records by Dow Jones & Company, Inc., Boston Globe Media Partners, LLC, and Reuters New & Media, Inc.* [ECF No. 2288] (the "Reply"),² and respectfully states as follows:

STATEMENT

2. The Side A ICSPs share the commitment to transparency expressed by the Debtors and other parties in these chapter 11 cases. The Side A ICSPs participated in the meet-and-confer process to resolve the issues raised by the Motions to Unseal that resulted in the filing of over 500 documents on the public docket (with certain limited redactions). The Media Intervenors request in the Reply that the Court order the unsealing of the Privilege Log Materials that were attached as exhibits to the UCC's Motions to Compel. See Reply at 6-7. For the avoidance of doubt, the Side A ICSPs join in the Debtors and Raymond Sackler Family's opposition to this request. See Debtors' Limited Objection to the Media Intervenors' Motions to Intervene and Unseal Judicial Records and Cross-Motion to Seal Certain Judicial Records [ECF No. 2252] at 13 n.12; Statement of the Raymond Sackler Family in Respect of the Motion to Intervene and Unseal Judicial Records by Dow Jones & Company, Inc., Boston Globe Media Partners, LLC, and Reuters News & Media, Inc. [ECF No. 2132] at 5-6.

² Capitalized terms not defined herein have the same meanings as in the Reply.

CONCLUSION

3. For the foregoing reasons, the Side A ICSPs respectfully join the Debtors and Raymond Sackler Family's request that the Court deny the Media Intervenors' Motions to unseal the Privilege Log Materials.

Dated: January 19, 2021 New York, New York

> By: /s/ Jasmine Ball

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